

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RICHARD IRVING BECKMAN)
AND KARI ANN BECKMAN,)
)
Plaintiffs,)
) CIVIL ACTION NO.
v.) 1:23-CV-06000-SEG
)
REGINA CAELI, INC. a/k/a)
REGINA CAELI ACADEMY,)
)
Defendant.)

**JOINT MOTION TO EXTEND DISCOVERY AND AMEND SCHEDULING
ORDER**

Pursuant to Federal Rules of Civil Procedure 6(b), 16(b)(4) and L.R. 26.2(B), Plaintiffs Richard Irving Beckman and Kari Ann Beckman (together, the “Beckmans” or “Plaintiffs”) and Defendant Regina Caeli, Inc. a/k/a Regina Caeli Academy (“RCA” or “Defendant”) jointly move this Court to extend discovery and enter a Fourth Amended Scheduling Order. Good cause exists for this extension for the following reasons:

1. Plaintiffs notified Defendant of their intent to substitute their counsel on April 10, 2025. [Doc. 112-1].
2. Plaintiffs filed their Amended Notice of Substitution of Counsel on April 25, 2025. [Doc. 116].

3. Upon receipt of Plaintiffs' notice of intent to substitute counsel, Defendant moved to extend discovery. [Doc. 112].

4. Shortly thereafter, Plaintiffs filed their Motion for Leave to File Third Amended Complaint ("Motion for Leave"). [Doc. 122]. Of note, Plaintiffs sought to dismiss their negligent misrepresentation claim and Rich Beckman's Fair Labor Standards Act ("FLSA") claim, as well as request attorneys' fees under O.C.G.A. § 13-6-11. Defendant timely filed a Response in Opposition to Plaintiffs' Motion for Leave to the extent it sought to add an O.C.G.A. § 13-6-11 claim. [Doc. 125]. Plaintiffs' Motion for Leave is fully briefed but remains pending.

5. On June 20, 2025, the Court granted Defendant's Motion to Extend Discovery (in part), and extended fact discovery by and until September 5, 2025. [Doc. 123].

6. On August 19, 2025, the Parties filed a Joint Motion to Extend Discovery and Amend Scheduling Order [Doc. 129], which the Court granted on August 21, 2025 [Doc. 130], extending the fact discovery deadline to October 10, 2025.

7. On October 9, 2025, the Parties filed an additional Joint Motion To Extend Discovery And Amend Scheduling Order [Doc. 136], which the Court granted on October 10, 2025 [Doc. 137], extending the fact discovery deadline one month, until November 10, 2025. This request was made, in part, as Plaintiffs had

requested certain documents be gathered following the depositions of key witnesses and Defendant agreed to gather those documents.

8. Defendant has gathered the available above referenced documents and the amount gathered is voluminous. It will take Defendant additional time to apply the search terms suggested by Plaintiffs, modify those terms if necessary, and review for responsiveness, relevance, privilege, and confidentiality. Consequently, this additional request to the Scheduling Order.

9. Over the past few months, the Parties have diligently pursued discovery. The Parties have produced additional documents, exchanged written conferrals, supplemented written responses, and have conducted six depositions.

10. However, the Parties continue to diligently work toward supplementing their discovery responses and require additional time to do so. There shall be no additional depositions of fact witnesses and the parties shall not serve any further discovery requests.

11. For these reasons, and to meet the discovery needs of the case, good cause exists for extending discovery and amending the Scheduling Order.

12. Therefore, the Parties jointly request that fact discovery be extended by and until December 10, 2025, to accommodate the Parties' efforts to resolve outstanding discovery items.

13. For the reasons laid out herein, the Court should grant this Motion and enter the Parties' Joint Proposed Third Amended Scheduling Order. A proposed Order is attached hereto as Exhibit A.

Respectfully submitted this 6th day of November, 2025.

HASSON LAW GROUP, LLP

/s/ Tanner Lusk

Keith S. Hasson
Georgia Bar No. 336383
Max S. Franco
Georgia Bar No. 355592
J. Tanner Lusk
Georgia Bar No. 496782
3379 Peachtree Rd., NE, Suite 625
Atlanta, GA 30326
Phone: (678) 701-2869
keith@hassonlawgroup.com
max@hassonlawgroup.com
tanner@hassonlawgroup.com

Counsel for Plaintiffs

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Steven R. Press

Steven R. Press
Georgia Bar No. 587199
Tyler Bishop
Georgia Bar No. 566705
3414 Peachtree Road, NE, Suite 1500
Atlanta, GA 30326
Phone: (404) 577-6000
spress@bakerdonelson.com
tbishop@bakerdonelson.com

*Counsel for Defendant Regina Caeli,
Inc., a/k/a Regina Caeli Academy*

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel certifies that the pleading has been prepared in Times New Roman, 14-point type, which is of the font selections approved by the Court in Local Rule 5.1(B).

Respectfully submitted this 6th day of November 2025.

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Steven R. Press

Steven R. Press

Georgia Bar No. 587199

Tyler Bishop

Georgia Bar No. 566705

3414 Peachtree Road, NE, Suite 1500

Atlanta, GA 30326

Phone: (404) 577-6000

spress@bakerdonelson.com

tbishop@bakerdonelson.com

CERTIFICATE OF SERVICE

This will certify service of a copy of the foregoing was filed and served via the CM/ECF online filing system with the U.S. District Court for the Northern District of Georgia, which will automatically send email notification to all counsel of record.

Respectfully submitted this 6th day of November 2025.

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

/s/ Steven R. Press

Steven R. Press
Georgia Bar No. 587199
Tyler Bishop
Georgia Bar No. 566705
3414 Peachtree Road, NE, Suite 1500
Atlanta, GA 30326
Phone: (404) 577-6000
spress@bakerdonelson.com
tbishop@bakerdonelson.com